District Judge Tana Lin 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 ABHINANDAN BHUNIA. Case No. 2:24-cy-01868-TL 10 Plaintiff, STIPULATED MOTION TO STAY 11 CASE IN ABEYANCE AND v. [PROPOSED] ORDER 12 PAMELA BONDI, et al., 1 Defendants. Noted for Consideration: 13 February 18, 2025 14 15 Plaintiff Abhinandan Bhunia brings this litigation pursuant to the Mandamus Act, seeking 16 an order to compel U.S. Citizenship and Immigration Services ("USCIS") to adjudicate his Form 17 I-485, Application to Register Permanent Residence or Adjust Status. This case is currently 18 stayed through today. Dkt. No. 9. For good cause, the parties request that the Court continue the 19 stay through March 4, 2025. 20 Courts have "broad discretion" to stay proceedings. Clinton v. Jones, 520 U.S. 681, 706 21 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to 22 control the disposition of the causes on its docket with economy of time and effort for itself, for 23 ¹ Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Attorney General Pamela Bondi for Merrick Garland; Secretary Kristi Noem for Alejandro Mayorkas; and Acting Director Jennifer Higgens for Ur 24 Mendoza Jaddou.

STIPULATED MOTION FOR ABEYANCE [Case No. 2:24-cv-01868-TL] - 1

UNITED STATES ATTORNEY 1201 PACIFIC AVE., STE. 700 TACOMA, WA 98402 (253) 428-3800

counsel, and for litigants." Landis v. N. Am. Co., 299 U.S. 248, 254 (1936); see also Fed. R. Civ. 2 P. 1. 3 With additional time, this case may be resolved without the need of further judicial intervention. Plaintiff attended a meeting with USCIS this morning concerning the adjudication 4 5 of his Form I-485. Additional time is necessary for the adjudication to be completed. Once adjudicated, this case will be moot. Accordingly, the parties request that the Court hold the case 6 7 in abeyance until March 4, 2025. The parties will submit a joint status report on or before March 8 4, 2025. 9 DATED this 18th day of February, 2025. 10 Respectfully submitted, 11 TEAL LUTHY MILLER Acting United States Attorney 12 s/ Michelle R. Lambert MICHELLE R. LAMBERT, NYS #4666657 13 **Assistant United States Attorney** United States Attorney's Office 14 Western District of Washington 1201 Pacific Avenue, Suite 700 15 Tacoma, Washington 98402 Phone: (206) 553-7970 16 (206) 553-4067 Fax: Email: michelle.lambert@usdoj.gov 17 18 Attorneys for Defendants 19 I certify that this memorandum contains 317 words, in compliance with the Local Civil Rules 20 s/ Abhinandan Bhunia ABHINANDAN BHUNIA 21 2122 47TH Avenue SW Seattle, Washington 98116 22 Phone: 215-827-6849 Email: abhi1.bhunia@gmail.com 23 Pro Se Plaintiff 24

STIPULATED MOTION FOR ABEYANCE [Case No. 2:24-cv-01868-TL] - 2

UNITED STATES ATTORNEY 1201 PACIFIC AVE., STE. 700 TACOMA, WA 98402 (253) 428-3800

CERTIFICATE OF SERVICE

I hereby certify that I am an employee in the Office of the United States Attorney for the Western District of Washington and of such age and discretion as to be competent to serve papers.

I further certify on today's date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following CM/ECF participant(s):

- 0 -

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

I further certify on today's date, I arranged for service of the foregoing on the following non-CM/ECF participant(s), via Certified Mail with return receipt, postage prepaid, addressed as follows:

Abhinandan Bhunia, *Pro Se Plaintiff* 2122 47TH Avenue SW Seattle, Washington 98116

DATED this 18th day of February, 2025.

s/ Stephanie Huerta-Ramirez

STEPHANIE HUERTA-RAMIREZ, Legal Assistant United States Attorney's Office Western District of Washington

700 Stewart Street, Suite 5220

Seattle, WA 98101 Phone: (206) 553-7970 Fax: (206) 553-4073

Email: <u>Stephanie.Huerta-Ramirez@usdoj.gov</u>

20

21

22

23

24

STIPULATED MOTION FOR ABEYANCE [Case No. 2:24-cv-01868-TL] - 3

UNITED STATES ATTORNEY 1201 PACIFIC AVE., STE. 700 TACOMA, WA 98402 (253) 428-3800

[PROPOSED] ORDER

The case is held in abeyance until March 4, 2025. The parties shall submit a joint status report on or before March 4, 2025. It is so **ORDERED**.

DATED this 18th day of February 2025.

TANA LIN

United States District Judge

STIPULATED MOTION FOR ABEYANCE [Case No. 2:24-cv-01868-TL] - 4